

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	)	
	)	
William S. Duffett, Jr.,	)	Case No. 18-24794-CMB
	)	Chapter 13
Debtor	)	Related to Docket No.41
	)	
	)	
Citizens Bank of Pennsylvania,	)	Hearing Date:
	)	June 5, 2019
Movant	)	
	)	
vs.	)	
	)	
William S. Duffett, Jr.,	)	
	)	
Respondent	)	

**RESPONSE TO MOTION OF CITIZENS BANK OF PENNSYLVANIA FOR  
RELIEF FROM THE AUTOMATIC STAY**

AND NOW, comes the debtor, William S. Duffett, Jr., by and through his attorney, Lauren M. Lamb and Steidl and Steinberg, and respectfully represents as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted with clarification. It is admitted that Movant has not received payments for the months of December 2018, January 2019, February 2019 and March 2019. However, there is currently \$3,571.90 on hand with the

Chapter 13 Trustee, which is sufficient to pay at least two months of the post-petition arrears.

7. Admitted.
8. Denied. Debtor demands strict proof of the fees Movant incurred in the filing of this Motion.
9. Admitted.
10. Admitted.
11. Admitted.
12. This is a statement to which no response is required. To the extent that a response is required, the same is denied.
13. Denied. Movant is adequately protected by the Chapter 13 Plan and the payments being made by Debtor.
14. Denied.
15. Denied.

WHEREFORE, the debtor, William S. Duffett, Jr., respectfully request this Honorable Court deny this Motion for Relief from the Automatic Stay.

Respectfully submitted,

April 25, 2019  
DATE

/s/Lauren M. Lamb  
Lauren M. Lamb, Esquire  
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